

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: Attorney General, Set 4

DATED: October 3, 2001

ITEM: AG-VZ 4-3 Please refer to Mr. Mudge's rebuttal testimony, Attachment 2.

- a. Please provide all details as to how the "original ASR submitted by the carrier was not complete."
- b. Please identify by name the "Verizon MA representative" and "the carrier" described in Attachment 2 and provide all details of the communication between the Verizon MA representative and the carrier in which the carrier allegedly was advised "that there were incorrect assignments provided on the ASR on April 27th, May 4th and May 7th." Please also provide the "additional information" that was furnished to Verizon MA by the carrier on May 4th, May 8th and May 9th.
- c. Please provide copies of all notes and other documentation in Verizon MA's possession pertaining to the ETI service that is discussed in Mr. Mudge's rebuttal testimony, Attachment 2.
- d. Please identify by name the individuals who assisted Mr. Mudge in preparing Attachment 2 and provide copies of all documents upon which Mr. Mudge relied in preparing Attachment 2.
- e. Please indicate whether Verizon MA is in possession of the New Jersey Division of the Ratepayer Advocate's response to Verizon New Jersey interrogatory VNJ-RPA-90 in New Jersey Board of Public Utilities Docket No. TO01020095, in which the Ratepayer Advocate provided Verizon New Jersey with a copy of ETI's detailed notes regarding its interactions with AT&T

ITEM: AG-VZ 4-3
(cont'd)

and Verizon relative to the T-1 service at Two Center Plaza.

- f. Please identify by name and provide a copy of all notes taken by "Verizon MA's local service engineer" pertaining to his site visit to ETI's premises at Two Center Plaza on May 22, 2001.
- g. Please provide all written guidelines, policies or practices supporting the contention allegedly made by "Verizon MA's engineer ... that Verizon MA's regular practice is to provision T1 service via fiber and electronics whenever possible."
- h. Please provide copies of any and all cost studies, engineering economic analyses, and underlying data comparing the cost of a fiber optic vs. a copper provisioning arrangement where the customer requirement is for a single T1 line only and where the distance between the customer and the serving wire center is in the range of 500 feet or less.
- i. Please identify by name, title and organizational affiliation within Verizon all individuals with whom Mr. Mudge conferred in preparing Attachment 2. For each such conversation, provide the date at which it occurred, the name(s) of all persons present, and the nature of the subjects discussed. Indicate what steps, if any, Mr. Mudge undertook to verify the accuracy of the information furnished to him.

REPLY:

- a. The original ASR had an incorrect Connecting Facility Assignment (CFA). The CFA identifies the customer carrier system and channel assignment to be used in handing off the requested service to the customer. The CFA is provided by the carrier. The original CFA provided on the ASR in question was already in use for another circuit.
- b. Several different representatives worked on this request; the representative who issued the original service order was Mr. M. Brucato. Dr. Selwyn, on behalf of the Attorney General, has represented that the carrier was AT&T. Attached are copies of the system notes identifying the relevant carrier and detailing the communications between Verizon MA and the carrier, the facilities to be provided and the nature of the information

REPLY: AG-VZ 4-3
(cont'd)

provided on May 4th, 8th and 9th. Verizon considers the requested information to be confidential and proprietary communications between Verizon and the customer of record. Neither the Attorney General nor ETI is the customer of record. The information is, accordingly, being provided only to the Department and to those parties to whom the customer of record authorizes disclosure. As the Attorney General's witness has represented that the carrier was AT&T, no hardship arises in the Attorney General's seeking such authorization.

- c. Please see parts (b) and (f).
- d. Please see parts (b) and (f) for attachments. The individuals who assisted Mr. Mudge in preparing Attachment 2 were:
 - Mr. John Conroy – Director, MA Regulatory
 - Ms. Allison Hallissey – Manager, Carrier/CLEC Services
 - Mr. Thomas MacNabb – Senior Staff Manager, MA Regulatory
 - Mr. Evan Mcsorley – Engineer, Network Engineering
 - Mr. Christopher Parker – Manager, Network Engineering
- e. Yes.
- f. The local service engineer that visited ETI's location on May 22, 2001 was Mr. Evan Mcsorley. Attached are copies of Mr. Mcsorley's work notes and system notes. Verizon MA considers the requested information to be proprietary. The documents set forth Verizon MA's engineering design that relates to a carrier specific request for service. The information is, accordingly, being provided only to the Department and to those parties to whom the customer of record authorizes disclosure. As the Attorney General's witness has represented that the carrier was AT&T, no hardship arises in the Attorney General's seeking such authorization.
- g. Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.

REPLY: AG-VZ 4-3
(cont'd)

- h. Verizon objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and commercially sensitive material.
- i. Please see part (d). In conferring with these individuals, Mr. Mudge reviewed the information provided and found it to be accurate. Verizon MA is unable to identify with specificity the remaining information.

VZ # 118